

From: [James Pieron](#)
To: [Kim D. Pavlik](#)
Subject: James Pieron / Tax Re-filing 08/09/10
Date: Thursday, November 03, 2011 11:04:58 PM
Attachments: [Capital Gain 2008- 10M.pdf](#)
[James Pieron - Foreign Income - 2008 - 2009.pdf](#)
[James Pieron - W2 2010.pdf](#)
[Pieron - 2010 IRS eFile.pdf](#)
[K-1 2010.pdf](#)
[Capital Gain 2009 - 5.25M.pdf](#)
[RETURN - 2009.pdf](#)
[RETURN - 2008.pdf](#)
[Accounting - 2007-2010 -.xlsx](#)

Thanks again Kim.

Please let me know if you need any additional documents.

James.

From: Kim D. Pavlik [mailto:kim.pavlik@ahpplc.com]
Sent: Wednesday, December 22, 2010 2:25 PM
To: James Pieron
Subject: 2007-2009

James,

I looked at the information. The term I was drawing a blank on was the Claim of Right principle. Unfortunately, after reviewing the facts, that does not really apply to your situation.

However, I did have another idea. Based on the sale document you supplied, the closing date of the first sale of 20% was 1/1/08. If the 2007 payments are treated as deposits, and the sale closed in 2008, the whip-saw effect may be mitigated.

One confusing item is that the 2009 document also says the closing date was 1/1/08 for the 15% sale. I assume that is just an error because the first document was used as a template?

The basis issues are not totally clear, but if the closing dates are used, the results may be more tolerable.

I left a message this morning, and I will be out after noon 12/23 until 1/3/11, so I decided to leave this email message.

If you would like to discuss further, please call me this afternoon or tomorrow morning. If we do not connect, I would be happy to work with you on this in early January.

Happy holidays!

Kim

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Kim D. Pavlik, CPA
Partner

Andrews Hooper Pavlik PLC
5300 Gratiot
Saginaw, MI 48638
phone: (989) 497-5300
fax: (989) 497-5353
www.ahpplc.com

kim.pavlik@ahpplc.com
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From: James Pieron [mailto:james.pieron@ilq.com]
Sent: Wednesday, December 22, 2010 2:35 AM
To: Kim D. Pavlik
Subject: RE: James Pieron / 2007-2009

Hi Kim,

As we discussed, please review the attached documents.

Thanks,
James.

From: James Pieron
Sent: Friday, December 17, 2010 1:49 PM
To: 'kim.pavlik@ahpplc.com'
Subject: James Pieron / 2007-2009

Hi Kim,

Thanks for your time – let's talk at 3PM.

James.
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